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*Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DANNY JACK HART, individually,

Plaintiff,

vs.

LOWE'S HOME CENTERS, LLC, a foreign  
corporation; STAN GARDENHIRE, an  
individual; JACK BUCHANAN, an  
individual; DOE INDIVIDUALS I-XX; and  
ROE ENTITIES I-XX,

Defendants.

Case No.: 2:20-cv-00773-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
FILE A RESPONSE IN OPPOSITION  
TO DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

[FIRST REQUEST]

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, DANNY JACK HART, by and through his attorney, E. Brent Bryson, Esq. of E. Brent Bryson, Ltd., and Defendant LOWE'S HOME CENTERS, LLC, by and through its attorneys, Steven T. Jaffe, Esq. and Kevin S. Smith, Esq., of Hall Jaffe & Clayton, LLP, as follows:

1. That Lowes filed its Motion for Summary Judgment on February 24, 2023 [ECF No. 57];

2. That the deadline for Plaintiff's response brief in opposition to Defendant's motion for summary judgment is March 10, 2023;

///

1           3.       That Plaintiff's counsel, Mr. E. Brent Bryson, Esq., has experienced a death in his  
2 family;

3           4.       That, therefore, there is good cause and the parties agree to extend the deadline  
4 for Plaintiff to file his brief in opposition to Defendant's motion for summary judgment by an  
5 additional fourteen (14) days beyond the current due date of March 10, 2023, until March 24,  
6 2023.

7  
8           5.       That this is the first request to extend Plaintiff's response deadline and is not  
9 being made for the purpose of delay.

10 DATED this 10<sup>th</sup> day of March, 2023.

DATED this 10<sup>th</sup> day of March, 2023.

11 E. BRENT BRYSON, LTD.

HALL JAFFE & CLAYTON, LLP

12 /s/ E. Brent Bryson

/s/ Kevin S. Smith

13 E. Brent Bryson Esq.

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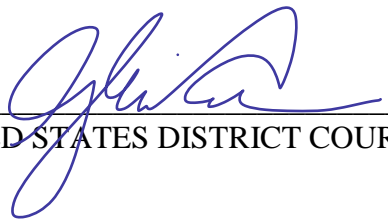
Lowe's Home Centers, LLC

**ORDER**

Based on the stipulation of the parties and with good cause shown, the Court orders as follows:

**IT IS SO ORDERED** that the deadline for Plaintiff to file a response brief in opposition to Defendant's Motion for Summary Judgment is extended fourteen (14) additional days beyond the current due date of March 10, 2023, until March 24, 2023.

DATED this 10 day of March, 2023.

  
UNITED STATES DISTRICT COURT JUDGE

Respectfully Submitted By:

E. Brent Bryson, Ltd.

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